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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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SAN FRANCISCO DIVISION

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IN RE: UBER TECHNOLOGIES, INC.,

Case No. 3:23-md-03084-CRB (LJC)

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PASSENGER SEXUAL ASSAULT

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LITIGATION

DECLARATION OF MAYA R. KALONIA IN SUPPORT OF PLAINTIFFS' POSITION IN THE JOINT LETTER REGARDING 30(b)(6) TOPICS AND WRITTEN DISCOVERY

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This Document Relates to:

Judge: Hon. Lisa J. Cisneros
Courtroom: G - 15th Floor

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ALL MATTERS

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1   I, Maya R. Kalonia, declare:

2   1.   I am an attorney in the law firm of Girard Sharp, LLP, and counsel for Plaintiffs in

3   the above-captioned Multi-District Litigation. I am a member of the State Bar of California and am

4   admitted to practice before this Court. I make this declaration based on my own personal

5   knowledge. If called upon to testify, I could and would testify competently to the truth of the

6   matters stated herein.

7   2.   Attached as **Exhibit A** is a true and correct copy of excerpts of the Uber

8   Defendants' August 18, 2025 Objections and Responses to Plaintiffs' Interrogatories and Requests

9   for Admission in Lieu of 30(b)(6) depositions. Because Uber marked this document as Highly

10   Confidential-Attorneys' Eyes Only, it has been filed under seal.

11   3.   Attached as **Exhibit B** is a true and correct copy of excerpts of the August 21, 2025

12   deposition transcript of Chad Dobbs. Because Uber has marked the transcript as Highly

13   Confidential, it has been filed under seal.

14   4.   Attached as **Exhibit C** is a true and correct copy of excerpts of Exhibit 1897 from

15   the August 21, 2025 deposition transcript of Chad Dobbs. Because Uber has marked the transcript

16   as Highly Confidential, it has been filed under seal.

17   5.   Attached as **Exhibit D** is a true and correct copy of a document Uber produced

18   bates-stamped UBER_JCCP_MDL_0003276626. Because Uber marked this document as

19   Confidential, it has been filed under seal.

20   6.   Attached as **Exhibit E** is a true and correct copy of a document Uber produced

21   bates-stamped UBER_JCCP_MDL_002618039. Because Uber marked this document as

22   Confidential, it has been filed under seal.

23   I declare under penalty of perjury that the foregoing is true and correct.

24   Executed this 8th day of September, 2025 in Oakland, CA.

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26   */s/ Maya R. Kalonia*
                                   Maya R. Kalonia

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DECLARATION OF MAYA R. KALONIA IN SUPPORT OF PLAINTIFFS' POSITION IN
THE JOINT LETTER REGARDING 30(b)(6) TOPICS AND WRITTEN DISCOVERY
                   Case No. 3:23-md-03084-CRB (LJC)